

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

NYKREDIT PORTEFØLJE
ADMINISTRATION A/S, OKLAHOMA
FIREFIGHTERS PENSION AND
RETIREMENT SYSTEM, OKLAHOMA LAW
ENFORCEMENT RETIREMENT SYSTEM,
OKLAHOMA POLICE PENSION AND
RETIREMENT SYSTEM, OKLAHOMA CITY
EMPLOYEE RETIREMENT SYSTEM,
POLICE AND FIRE RETIREMENT SYSTEM
OF THE CITY OF DETROIT, Individually and
on behalf of all other similarly situated,

Plaintiffs,

VS.

PROPETRO HOLDING CORP., ET AL.,
Defendants.

CASE No. MO:19-CV-00217-DC

**JOINT MOTION FOR LEAVE TO FILE IN EXCESS OF DEFAULT PAGE
LIMIT**

Pursuant to Local Rule CV-7(d)(3), Defendants ProPetro Holding Corp., Spencer D. Armour III, Dale Redman, Ian Denholm, and Jeffrey Smith (the “Defendants”) and Plaintiffs Nykredit Portefølje Administration A/S, Oklahoma Firefighters Pension and Retirement System, Oklahoma Law Enforcement Retirement System, Oklahoma Police Pension and Retirement System, Oklahoma City Employee Retirement System, and Police and Fire Retirement System of the City of Detroit (the “Plaintiffs”) respectfully move this Honorable Court for leave to file their forthcoming briefs relating to Plaintiffs’ Motion for Class Certification (the “Motion”) in excess of the default page limits set forth in the Rule, due to the breadth and complexity of the legal issues raised by the Motion. Accordingly, the parties respectfully request that Defendants be

granted leave to file a brief in opposition to the Motion up to and including 25 pages in length, exclusive of the caption, signature block, any certificate, Tables of Contents and Authorities, and accompanying documents/exhibits; and Plaintiffs be granted leave to file a reply brief in further support of the Motion up to and including 15 pages in length, exclusive of the caption, signature block, any certificate, Tables of Contents and Authorities, and accompanying documents/exhibits.

Dated: July 21, 2022

Respectfully submitted,

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

By: /s/ James A. Harrod
Jeroen van Kwawegen
James A. Harrod
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
jeroen@blbglaw.com
jim.harrod@blbglaw.com

GRANT & EISENHOFER P.A.

By: /s/ Daniel L. Berger
Daniel L. Berger
Caitlin M. Moyna
485 Lexington Avenue
New York, NY 10017
Telephone: (646) 722-8500
Facsimile: (646) 722-8501
dberger@gelaw.com
cmoyna@gelaw.com

*Counsel for Plaintiffs and Lead Counsel for
the Class*

HUGHES HUBBARD & REED LLP

By: /s/ Kevin Abikoff
Kevin T. Abikoff (Texas Bar No. 24034118)
Benjamin S. Britz (admitted pro hac vice)
1775 I Street, NW
Washington, DC 20006
Telephone: (202) 721-4600
Fax: (202) 721-4646
Email: kevin.abikoff@hugheshubbard.com
Email: benjamin.britz@hugheshubbard.com

Shahzeb Lari (admitted pro hac vice)
One Battery Park Plaza
New York, NY 10004-1482
Telephone: (212) 837 6000
Fax: (212) 422 4726
Email: shahzeb.lari@hugheshubbard.com

*Attorneys for Defendants ProPetro Holding
Corp. and Spencer D. Armour III*

WINSTEAD PC

By: /s/ Toby Galloway
Toby M. Galloway (Texas Bar No. 00790733)
Matthias Kleinsasser (Texas Bar No.
24071357)
300 Throckmorton Street

MARTIN & DROUGHT, P.C.

Gerald T. Drought
State Bar No. 06134800
Federal Bar No. 8942
Frank B. Burney
State Bar No. 03438100
Bank of America Plaza, 25th Floor 300
Convent Street San Antonio, Texas 78205
Telephone: (210) 227-7591
Facsimile: (210) 227-7924
gdrought@mdtlaw.com
fburney@mdtlaw.com

Liaison Counsel for Plaintiffs

CLARK HILL PLC

Ronald A. King
212 E. Cesar Chavez Ave
Lansing, MI 48906
Telephone: (517) 318-3015
Facsimile: (517) 318-3068
rking@clarkhill.com

*Counsel for Plaintiff Police and Fire
Retirement System of the City of Detroit*

Suite 1700
Fort Worth, Texas 76102
Telephone: (817) 420-8200
Fax: (817) 420-8201
Email: tgalloway@winstead.com
Email: mkleinsasser@winstead.com

Attorneys for Defendant Dale Redman

BELL NUNNALLY & MARTIN LLP

By: /s/ Craig Warner
Craig M. Warner (Texas Bar No. 24084158)
2323 Ross Avenue
Suite 1900
Dallas, Texas 75201
Telephone: (214) 740-1400
Fax: (214) 740-1499
Email: cwarner@bellnunnally.com

Attorney for Defendant Ian Denholm

EDMUNDSON SHELTON WEISS PLLC

By: /s/ J. Kevin Edmundson
J. Kevin Edmundson (Texas Bar No.
24044020)
Jesse Z. Weiss (Texas Bar No. 24013728)
317 Grace Lane
Suite 210
Austin, Texas 78746
Telephone: (512) 596-3058
Fax: (512) 532-6637
Email: kevin@eswpllc.com
Email: jesse@eswpllc.com

Attorneys for Defendant Jeffrey Smith

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served electronically to counsel of record on July 21, 2022, via the Court's CM/ECF system.

/s/ Kevin T. Abikoff

Kevin T. Abikoff